

STEPHEN M. FUERCH, SBN #65864  
steve@fuerchlegal.com  
 LAW OFFICES OF STEPHEN M. FUERCH  
 A Professional Corporation  
 7901 Stoneridge Drive, Suite 401  
 Pleasanton, California 94588  
 Telephone: (925) 463-1073  
 Facsimile: (925) 463-2937

Attorney for Defendant OFFICER DEBORAH TRUJILLO

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

KATHY LEE,

Plaintiff,

vs.

CITY OF SAN LEANDRO, IAN R. WILLIS,  
 in his official capacity as Chief of Police in San  
 Leandro, OFFICER DEBORAH TRUJILLO  
 (#297), individually and in her official capacity,  
 SAN LEANDRO POLICE DEPARTMENT,  
 DETECTIVE GOODMAN (#282), individually  
 and in his official capacity, DETECTIVE  
 RAMSEY (#307), individually and in his  
 official capacity, OFFICE L. BRANDT  
 (#273), individually and in his official capacity,  
 OFFICER GUILLEN (#291), individually and  
 in his official capacity, DET. SGT. DeCOSTA  
 (#243), individually and in his official capacity,  
 and DOES 1-40,

Defendants.

) Case No.: C 10-00104 MMC

) **STIPULATION AND ORDER RE: MOTION**  
 ) **FOR ADMINISTRATIVE RELIEF FOR**  
 ) **FILING OF DECLARATION OF**  
 ) **DEFENDANT DEBORAH TRUJILLO**  
 ) **UNDER SEAL IN SUPPORT OF MOTION**  
 ) **FOR SUMMARY JUDGMENT OR,**  
 ) **ALTERNATIVELY, FOR SUMMARY**  
 ) **ADJUDICATION OF ISSUES [LOCAL**  
 ) **RULES 7-11, 7-12 and 79-5] ; DIRECTIONS TO**  
 ) **DEFENDANT TRUJILLO**

) **First Amended Complaint Filed: April 5, 2010**

The parties hereby stipulate as follows:

Defendant Deborah Trujillo ("defendant Trujillo"), individually and in her official capacity, intends to file a Motion for Summary Judgment or, alternatively, for Summary Adjudication of Issues on April 29, 2011 in the above-captioned matter;

STIPULATION FOR FILING DECLARATION OF DEF. TRUJILLO UNDER SEAL

Defendant Trujillo intends to file a Declaration in Support of her Motion for Summary Judgment or, Alternatively, for Summary Adjudication of Issues, which will refer to and incorporate confidential material; specifically, an Affidavit for Warrant containing the identities of juveniles and victims of crimes and Search Warrant. Under the terms and conditions of a Stipulated Protective Order signed by the parties and ordered by Magistrate Judge Laurel Beeler on April 12, 2011, the Affidavit for Warrant was provided by counsel for Defendants City of San Leandro, Police Chief Ian R. Willis, Detective Goodman and Det. Sgt. DeCosta to counsel for plaintiff and defendant Trujillo on or about April 13, 2011;

Defendant Trujillo will file, concurrently with her Motion for Summary Judgment or, Alternatively, for Summary Adjudication of Issues, an accompanying Motion for Administrative Relief as required under Civil Local Rules 7-11 and 79-5 (b), seeking an order for the filing of her Declaration under seal in support of her Motion for Summary Judgment or, Alternatively, for Summary Adjudication of Issues;

Based on the confidentiality of information contained in the Affidavit for Warrant, that the Affidavit for Warrant was provided to all parties and counsel only after the Court signed a Stipulated Protective Order, the parties now stipulate as follows:

IT IS HEREBY STIPULATED by and between the parties to the above-captioned matter that the Declaration of Deborah Trujillo and attached exhibits in support of her Summary Judgment or, Alternatively, for Summary Adjudication of Issues shall be filed under seal in accordance with Civil Local Rules 7-11 and 79-5 (b).

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

DATED: April 26, 2011.

Respectfully submitted,

LAW OFFICES OF STEPHEN M. FUERCH  
A Professional Corporation

By: \_\_\_\_\_

STEPHEN M. FUERCH  
Attorneys for Defendant DEBORAH TRUJILLO

1 DATED: April 26, 2011.

MEYERS, NAVE, RIBACK, SILVER & WILSON

2  
3 By: 

4 MATTHEW A. LAVRINETS

5 Attorneys for Defendants CITY OF SAN LEANDRO,  
6 POLICE CHIEF IAN R. WILLIS, DETECTIVE NEIL  
7 GOODMAN, and SGT. RICK DeCOSTA

8 DATED: April 28, 2011.

LAW OFFICE OF RUSSELL A. ROBINSON

9  
10 By: /s/

11 RUSSELL A. ROBINSON

12 Attorney for Plaintiff KATHY LEE

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED. Further, Trujillo is directed to file  
15 under seal the above-referenced declaration and exhibits attached thereto. See General Order  
16 No. 62 (providing if motion to seal is granted, "requesting party will e-file the document under  
seal").

DATED: ~~April~~ May, 2011.

17 May 3, 2011

18   
19 Hon. Maxine M. Chesney  
United States District Judge

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STIPULATION FOR FILING DECLARATION OF DEF. TRUJILLO UNDER SEAL